

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)	Chapter 7
)	Bankruptcy No. 14-13193
TREND SOUND PROMOTER AMG CORP.,)	
)	
Debtor(s).)	
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BANKRUPTCY ESTATE OF TREND)	Adversary No. 14-01248
SOUND PROMOTER AMG CORP.,)	
by and through Nancy James, Bankruptcy)	
Trustee,)	
)	
Plaintiff,)	
)	
v.)	
)	
VOLODIMYR PIGIDA and JANE DOE)	
PIGIDA, husband and wife, and the marital)	
community comprised thereof, individually)	DECLARATION OF NANCY JAMES
and as trustee of the Lakeshore Enterprises)	IN SUPPORT OF MOTION FOR
Trust; and MARINA BONDARENKO and)	PARTIAL SUMMARY JUDGMENT
JOHN DOE BONDARENKO, wife and)	
husband, and the marital community)	
comprised thereof, individually and as trustee)	
of the Lakeshore Enterprises Trust, and)	
SOUND STUDIOS LLC, a Washington)	
limited liability company,)	
)	
Defendants.)	
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The undersigned makes the following statement under penalty of perjury:

1. I am over 18 years of age, am competent to testify to the statements herein and make the statements herein based on facts personally known to me.
2. I am the duly appointed Chapter 7 trustee for the above-captioned case.

3. I have served on the Panel of Chapter 7 Bankruptcy Trustee at Seattle since 1984. During that time I have served as the trustee on tens of thousands of cases of which hundreds were asset cases. I have negotiated hundreds of settlement agreements which were approved by the Bankruptcy Court.

4. I have investigated the financial affairs of this debtor. I have reviewed the schedules filed by the debtor. I attended the 341 hearing wherein Volodymyr Pigida, a principal of the debtor, was questioned regarding the debtor's financial affairs.

5. The schedules indicate that the debtor has \$412,464 in assets and \$5,004,000 in debts.

6. I have begun a claims review and, although I have not completed a review of the claims, I would note that 1019 claims totaling \$11,418,779.50 have been filed.

7. Presently, I have \$225,887.79 in my account for this case. I anticipate that a liquidation of the remaining assets in this case, not counting this adversary proceeding, will total less than \$500,000.

8. In my opinion, this case will never amount to a 100 percent payout case.

9. The defendants in this action did receive more in payments than they would receive in a Chapter 7 proceeding had they not received the transfers.

DATED this 22nd day of April, 2015.

/S/ Nancy James

Nancy James